

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI

TAMY LORRAINE LUKECART
P.O. Box 1161
Warsaw, Missouri 65355

Plaintiff,

v.

CITY OF INDEPENDENCE, MISSOURI,
c/o Rebecca Behrens, City Clerk
Independence City Hall
111 E Maple Ave
Independence, MO 64050

And

CITY OF SUGAR CREEK, MISSOURI
c/o, Jana Olivarez-Dickerson, City Clerk
1001 Heroes Way
Sugar Creek, Missouri 64054

CHRISTOPHER SOULE
1001 Heroes Way
Sugar Creek, Missouri 64054

And

BRAD HALSEY
223 N. Memorial Drive
Independence, MO 64050

And

BRENDAN BUCHANAN
223 N. Memorial Drive
Independence, MO 64050

And

VICTOR CONTRERAS
1001 Heroes Way
Sugar Creek, Missouri 64054

And

DARREN SPADE
223 N. Memorial Drive
Independence, MO 64050

JURY TRIAL DEMANDED

Case No.: NEW CASE

Defendants.

)

COMPLAINT FOR DAMAGES

COMES NOW Plaintiff Tamy Lorraine Lukecart, by the undersigned counsel, and for this cause alleges as follows:

JURISDICTION AND VENUE

1. Defendants caused the death of Plaintiff's son, Dakota Lukecart (hereafter "DECEDENT"); therefore, Plaintiff brings this action for wrongful death and related claims pursuant to 42 U.S.C. § 1983 and for damages for wrongful death pursuant to the law of the state of Missouri.

2. Jurisdiction is proper in this Court, as the acts of the defendants complained of herein occurred in Jackson County, Missouri, and as Plaintiff's Decedent was first injured by the acts of the defendants in Jackson County, Missouri.

3. Venue is proper under 28 U.S.C. §1391(b) because the events giving rise to Plaintiff's claims occurred in this judicial district and, on information and belief, at least one Defendant is a resident of this district and all the Defendants reside in the State of Missouri.

PARTIES

4. At all relevant times, Plaintiff, Tamy Lorraine Lukecart (hereafter "LUKECART") was a citizen and resident of the state of Missouri who is a proper person to bring this suit pursuant to Mo. Rev. Stat. §537.080, *et seq.*, because she is a surviving parent of DECEDENT.

5. At all relevant times, Defendant City of Independence, Missouri (hereafter "INDEPENDENCE") is and was a Missouri municipal corporation situated and operating within Jackson County, Missouri.

6. At all relevant times, Defendant City of Sugar Creek, Missouri (hereafter "SUGAR CREEK") is and was a Missouri municipal corporation situated and operating within Jackson County, Missouri.

7. At all relevant times, Defendant Christopher Soule (hereafter "SOULE") was a police officer who was an employee, agent, servant, and/or representative of Defendant SUGAR CREEK,

and who served as Chief of Police. Upon information and belief, Defendant SOULE was and is a citizen of the state of Missouri, and he is sued herein in his individual and official capacities to the fullest extent allowable.

8. At all relevant times, Defendant Brad Halsey (hereafter “HALSEY”) was a police officer who was an employee, agent, servant, and/or representative of Defendant INDEPENDENCE, and who served as Chief of Police. Upon information and belief, Defendant HALSEY was and is a citizen of the state of Missouri, and he is sued herein in his individual and official capacities to the fullest extent allowable.

9. At all relevant times, Defendant Brendan Buchanan (hereafter “BUCHANAN”) was a police officer who was an employee, agent, servant, and/or representative of Defendant INDEPENDENCE, and who served as a police officer. Upon information and belief, Defendant SPADE was and is a citizen of the State of Missouri, and he is sued herein in his individual and official capacities to the fullest extent allowable.

10. At all relevant times, Defendant Darren Spade (hereafter “SPADE”) was a police officer who was an employee, agent, servant, and/or representative of Defendant INDEPENDENCE, and who served as a police officer. Upon information and belief, Defendant SPADE was and is a citizen of the State of Missouri, and he is sued herein in his individual and official capacities to the fullest extent allowable.

11. Defendant Victor Contreras (hereafter “CONTRERAS”) was a police officer who was an employee, agent, servant, and/or representative of Defendant SUGAR CREEK, and who served as a police officer. Upon information and belief, Defendant CONTRERAS was and is a citizen of the State of Missouri, and he is sued herein in his individual and official capacities to the fullest extent allowable.

12. At all relevant times, each defendant acted under the color of law and pursuant to the policies, regulations, or decisions officially adopted or promulgated by Defendants INDEPENDENCE and/or SUGAR CREEK, whose acts may fairly be said to represent official policy, or were pursuant to governmental custom of Defendants INDEPENDENCE and/or SUGAR CREEK.

FACTS COMMON TO ALL CLAIMS FOR RELIEF

13. Plaintiff repeats and re-alleges each and every allegation in paragraphs 1 through 12 of this Complaint with the same force and effect as if fully set forth herein.

14. On January 24, 2017 at approximately 2:00 a.m., on or near the Sundown Apartments in the City of Independence, Missouri, Defendant BUCHANAN attempted to initiate a traffic stop on DECEDENT due to expired tags on the vehicle driven by DECEDENT.

15. At that time, Defendant BUCHANAN had not seen any weapon or contraband in DECEDENT's possession, he had not seen DECEDENT commit any criminal or traffic offense, and he had no objectively reasonable basis to believe DECEDENT was about to take control of a weapon or contraband, or was about to commit any criminal or traffic offense.

16. Further, DECEDENT gave no appearance that he was in any way a danger to anyone.

17. Defendant BUCHANAN activated his emergency lights in an effort to stop DECEDENT. When DECEDENT did not stop for Defendant BUCHANAN, BUCHANAN immediately began pursuing him at a very high and dangerous speed through the streets of the cities of Independence and Sugar Creek.

18. As he was pursuing the vehicle, DECEDENT drove in an erratic manner and at a high rate of speed. Nevertheless, Defendant BUCHANAN continued the pursuit, disregarding

the danger that the speeding vehicles posed.

19. Multiple officers joined in the chase, including additional officers from Sugar Creek Police Department.

20. The vehicles were travelling at speed in excess of 50 m.p.h., and going through city intersections, yet there was no downgrade.

21. Eventually, Defendant BUCHANAN's chase caused the vehicles to leave the Independence city limits and enter onto roads in Sugar Creek beyond DEFENDANT BUCHANAN's jurisdiction.

22. At some point in the pursuit, Defendants SPADE and CONTRERAS joined in the pursuit.

23. During the pursuit, DECEDENT turned south on McBride in Sugar Creek, Missouri and reached a dead end. The officers, including Defendants BUCHANAN, CONTRERAS and SPADE, exited their vehicle when DECEDENT reached the dead end on McBride Street.

24. DECEDENT executed a U-turn and attempted to continue driving north on McBride. As DECEDENT was attempting to drive away, Defendants CONTRERAS and SPADE, under color of law and in the course and scope of their duties, shot DECEDENT multiple times in the chest and stomach, thereby using excessive force against him and eventually killing him. The officer involved shooting occurred on or near McBride Street.

25. At all relevant times, DECEDENT was unarmed and did not pose an immediate threat of death or serious bodily injury to himself or anyone else, including Defendants CONTRERAS and SPADE.

26. Defendants CONTRERAS and SPADE had the ability to remove themselves from

any possible or perceived danger posed by DECEDENT attempting to drive north on McBride.

27. Upon information and belief, all dashboard cameras which may have captured the immediate circumstances surrounding the shooting were “allegedly” malfunctioning and subsequently the incident was not captured on video despite the numerous number of police officers at the scene.

28. DECEDENT never made any threats or provocative gestures, did not have a weapon of any kind, so Defendants CONTRERAS and SPADE’s use of deadly force was objectively unreasonable and unjustified.

29. DECEDENT died within a few hours of the shooting as a result of Defendants use of unreasonable and excessive force as set forth above.

30. At all time, each defendant acted under the color of law.

CLAIMS FOR RELIEF

COUNT I. VIOLATION OF 42 U.S.C. §1983- WRONGFUL DEATH

(All Defendants)

31. Plaintiff repeats and re-alleges each and every allegation in paragraphs 1 through 30 of this Complaint with the same force and effect as if fully set forth herein.

32. At all relevant times, DECEDENT was known by Defendants BUCHANAN, CONTRERAS, and SPADE to be unarmed, had never presented as a danger to Defendants or anyone else when Defendants CONTRERAS and SPADE shot him so as to mortally wound him over the expired plates on his vehicle.

33. Defendants CONTRERAS and SPADE had a duty to exhaust all other reasonable means of apprehending DECEDENT prior to resorting to deadly force.

34. Defendants SOUSA and HALSEY and/or officers under their direction, had a

duty to downgrade Defendant BUCHANAN, CONTRERAS and SPADE's pursuit of DECEDENT and/or ensure Defendants BUCHANAN, CONTRERAS and SPADE exhausted all other reasonable means of apprehending DECEDENT prior to resorting to deadly force.

35. Defendants SOUSA and HALSEY had a duty to ensure that police officers under their command exhausted all other reasonable means of apprehending DECEDENT prior to resorting to deadly force.

36. Defendants INDEPENDENCE and SUGAR CREEK had a duty to ensure that its officers, agents, and employees exhausted all other reasonable means of apprehending DECEDENT prior to resorting to deadly force.

37. Defendants INDEPENDENCE and SUGAR CREEK were responsible for the administration of their Police Departments and for the developments of policy and custom of such department.

38. All of the defendants were obligated to abide by statutory and procedural guidelines for the implementation of deadly force, but none of them abided by the same.

39. Defendants failed to use that degree of care to ensure that citizens were not subjected to an unreasonable risk of harm by failing to exhaust all other reasonable means prior to resorting to the use of deadly force such as to proximately, directly, and wrongfully cause DECEDENT's death.

40. Defendants' conduct as stated in this count amounted to an unlawful, unconstitutional violation of DECEDENT's right to be free from the unnecessary and unreasonable use of deadly force.

41. As a direct and proximate result of such violations of DECEDENT's constitutional rights, DECEDENT wrongfully lost his life.

42. Defendants' actions were reckless and outrageous, and subjected DECEDENT to an unreasonable risk of harm. An award of punitive damages is warranted by Defendants' conduct.

43. Plaintiff is entitled to a recovery of reasonable attorney fees pursuant to 42 U.S.C. §1988.

WHEREFORE, Plaintiff prays for judgment in Count I in her favor and requests the following relief:

- A. Actual damages in a fair and reasonable amount in excess of \$75,000.00, plus interest on said sum at a rate of nine percent per annum on or from the date of DECEDENT's injuries; or, alternatively, from the date this complaint is filed;
- B. Punitive damages;
- C. Plaintiff's costs and reasonable attorney fees; and
- D. Any other relief consistent with substantial justice.

COUNT II - VIOLATION OF 42 U.S.C. §1983 – USE OF EXCESSIVE FORCE

(Against Defendants BUCHANAN, CONTRERAS and SPADE)

44. Plaintiff repeats and re-alleges each and every allegation in paragraphs 1 through 43 of this Complaint with the same force and effect as if fully set forth herein.

45. Defendant BUCHANAN, CONTRERAS and SPADE had no probable cause to believe that DECEDENT had committed, or was going to commit, a crime.

46. Defendants BUCHANAN, CONTRERAS and SPADE had no probable cause to believe that DECEDENT presented a risk of harm to anyone.

47. There were no exigent circumstances justifying Defendants use of deadly force without first resorting to other reasonable means of apprehending DECEDENT.

48. The force Defendants used was excessive because it was not reasonably necessary to effectively apprehend DECEDENT, even if it could be said that apprehension was ever reasonably necessary.

49. The law was clearly established on January 24, 2017, that it would be a violation of DECEDENT's constitutional rights for Defendants to kill him prior to resorting to other reasonable means of apprehending him where said Defendants had no probable cause to believe DECEDENT had committed, or was going to commit, a crime, and where DECEDENT did not present a risk of harm to anyone.

50. A police officer in the same circumstances and possessing the same knowledge as Defendants could not have reasonably believed that the use of deadly force was required to deal with DECEDENT in any way.

51. Defendants engaged in such conduct toward DECEDENT maliciously.

52. Said Defendants' conduct amounted to an unlawful, unconstitutional violation of DECEDENT's right to be free from the use of excessive force.

53. As a direct and proximate result of such violations of DECEDENT's constitutional rights. DECEDENT wrongfully lost his life.

54. The actions of Defendants, as stated above, were reckless and outrageous and subjected DECEDENT to an unreasonable risk of harm. An award of punitive damages is warranted by said Defendants' conduct.

55. Plaintiff is entitled to a recovery of reasonable attorney fees pursuant to 42. U.S.C. §1988.

WHEREFORE, Plaintiff prays for judgment in Count II in her favor and requests the following relief:

- A. Actual damages in a fair and reasonable amount in excess of \$75,000.00, plus interest on said sum at a rate of nine percent per annum on or from the date of DECEDENT's injuries; or, alternatively, from the date this complaint is filed;
- B. Punitive damages commensurate with Defendants' conduct;
- C. Plaintiff's costs and reasonable attorney fees; and
- D. Any other relief consistent with substantial justice.

COUNT III – VIOLATION OF 42 U.S.C. §1983 – FAILURE TO TRAIN

(Against Defendants INDEPENDENCE, SUGAR CREEK, SOULA, and HALSEY)

56. Plaintiff repeats and re-alleges each and every allegation in paragraphs 1 through 55 of this Complaint with the same force and effect as if fully set forth herein.

57. Defendants INDEPENDENCE, SUGAR CREEK, SOULA and HALSEY knew or should have known that law-enforcement officers in general, and Defendants BUCHANAN, CONTRERAS, and SPADE, in particular, would confront situations where, as here, a person poses no real or perceived threat to officers and can be safely apprehended if the circumstances would warrant apprehension.

58. Defendants INDEPENDENCE, SUGAR CREEK, SOULA and HALSEY failed to train Defendants BUCHANAN, CONTRERAS, and SPADE to handle such situations without involving the use of deadly, excessive, or other use of force on such persons, and without violating such persons' constitutional rights.

59. Defendants INDEPENDENCE, SUGAR CREEK, SOULA and HALSEY knew or should have known that the use of deadly or excessive was allowed only when the circumstances called for such force, and only then after first resorting to other reasonable means.

60. Defendants INDEPENDENCE, SUGAR CREEK, SOULA and HALSEY failed

to train Defendants BUCHANAN, CONTRERAS, SPADE to avoid using deadly or excessive force without first resorting to other reasonable means.

61. The failure of Defendants INDEPENDENCE, SUGAR CREEK, SOULA and HALSEY, individually and collectively, to adequately train Defendants BUCHANAN, CONTRERAS and SPADE resulted in violations of DECEDENT's constitutional rights.

62. As a direct and proximate result of such violations, DECEDENT wrongfully lost his life.

63. Said Defendants' actions and/or omissions, as stated above, were reckless and outrageous and subjected DECEDENT to an unreasonable risk of harm. An award of punitive damages is warranted by said Defendant's conduct.

64. Plaintiff is entitled to a recovery of reasonable attorney fees pursuant to 42 U.S.C. §1988.

WHEREFORE, Plaintiff prays for judgment in Count III in her favor and requests the following relief:

- A. Actual damages in a fair and reasonable amount in excess of \$75,000.00, plus interest on said sum at a rate of nine percent per annum on or from the date of DECEDENT's injuries; or, alternatively, from the date this complaint is filed;
- B. Punitive damages;
- C. Plaintiff's costs and reasonable attorney fees; and
- D. Any other relief consistent with substantial justice.

COUNT IV – WRONGFUL DEATH – MISSOURI LAW

(All Defendants)

65. Plaintiff repeats and re-alleges each and every allegation in paragraphs 1 through 64 of this Complaint with the same force and effect as if fully set forth herein.

66. Defendants CONTRERAS and SPADE had a duty to exhaust all other reasonable means of apprehending DECEDENT prior to resorting to deadly force.

67. Defendant BUCHANAN had a duty to downgrade the pursuit and to ensure Defendants exhausted all other reasonable means of apprehending DECEDENT prior to resorting to deadly force.

68. Defendants SOULA and HALSEY had a duty to ensure that police officers under their command posed no unnecessary risk to the public and that they exhausted all other reasonable means of apprehending DECEDENT prior to resorting to deadly force.

69. Defendants INDEPENDENCE AND SUGAR CREEK had a duty to ensure that its officers, agents, and employees posed no unnecessary risk to the public and that they exhausted all other reasonable means of apprehending DECEDENT prior to resorting to deadly force.

70. Defendants failed to use that degree of care to ensure that citizens were not exposed to unnecessary risk and subjected to an unreasonable risk of harm by exhausting all other reasonable means prior to resorting to the use of deadly force such as to proximately, directly, and wrongfully cause the death of DECEDENT.

71. As a direct and proximate result of Defendants' conduct, DECEDENT endured pain and suffering between the time he was mortally wounded by Defendants CONTRERAS and/or SPADE and the time he died.

72. As a direct and proximate result of Defendants' conduct, Plaintiff has suffered the loss of the consortium, services, companionship, comfort, instruction, guidance, and counsel of her son, and incurred unnecessary funeral and burial expenses.

73. Defendants' actions were reckless and outrageous and subjected DECEDENT to an unreasonable risk of harm. An award of punitive damages is warranted by Defendants' conduct.

WHEREFORE, Plaintiff prays for judgement in Count IV and requests the following relief:

- A. Damages in excess of \$75,000.00 for DECEDENT's pain and suffering between the time he was first injured by Defendants CONTRERAS and/or SPADE and the time of death, and for the recovery of which he might have maintained an action had death not ensued;
- B. Damages in excess of \$75,000.00 for Plaintiff's loss of the consortium, services, companionship, comfort, instruction, guidance, and counsel of DECEDENT, as well as funeral and burial expenses;
- C. Punitive damages; and
- D. Any other relief consistent with substantial justice.

JURY DEMAND

74. Plaintiff demands a jury trial.

Respectfully submitted,

/s/ Malia Parnell
Malia Taylor Parnell
MO Bar No.: 51210
David Tyson Smith
MO Bar No.: 51598
SMITH & PARNELL, LLC
700 Cherry Street
Columbia, MO 65201
Ph: (573) 442-4646
Fax: (573) 442-4646
malia@smithandparnell.com
david@smithandparnell.com

Attorneys for Plaintiffs

IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI

☐ AT KANSAS CITY ☒ AT INDEPENDENCE

RE: TAMY L LUKECART V CITY OF INDEPENDENCE, MISS ET AL
CASE NO: 2016-CV02502

TO: MALIA TAYLOR PARNELL
700 CHERRY ST
COLUMBIA, MO 65201

We have received pleadings, which you submitted for filing in the case and they have been file-stamped on 01-23-2020. However, your pleading cannot be processed further until the following action is taken:

RULE 3.2 - STYLE

- ☐ Additional service instructions are needed.
- ☐ Incorrect case number/filed in wrong county.
- ☐ Document is unreadable.

RULE 4.2 (2)

- ☐ Need Circuit Court Form 4

RULE 5.6 - COLLECTIONS OF DEPOSIT

- ☐ No fee, or incorrect fee, received; fee required is \$_____.
- ☐ Insufficient Filing Fee; Please Remit \$_____
- ☐ No signature on check/form 1695.
- ☐ No request to proceed in forma pauperis.
- ☐ No personal checks accepted.

RULE 68.1

- ☐ Need Circuit Court Form 17

☒ **OTHER:** Please provide service instruction once receive will issue summons. Thank you 881-1656.

- ☐ Please take the actions necessary to comply with the Circuit Court Rules and your request will be processed.
- ☐ The private process server listed is not on our approved list.
- ☐ Execution in effect. Return date _____. Request may be resubmitted within one week prior to return date.
- ☐ Supreme Court Rule 90.13 requires interrogatories be served with summons of garnishment.

RULE 68.7 - VITAL STATISTICS REPORT

- ☐ Need Certificate of dissolution of marriage form.

RULE 74.14 SUPREME CT - FOREIGN JUDGMENT

- ☐ Authentication of foreign judgment required.
- ☐ Affidavit pursuant to Supreme Court Rule 74.14

RULE 54.12 SERVICE IN REM OR QUASI IN REM ACTIONS

- ☐ Affidavit for Service by Publication required pursuant to Supreme Court Rule 54.12c.
- ☐ Order for Service by Publication required pursuant to Supreme Court Rule 54.12c.
- ☐ Notice for Service by Publication required pursuant to Supreme Court Rule 54.12c.
- ☐ Affidavit for Service by Certified/Registered Mail pursuant to Supreme Court Rule 54.12b.

If the filing was a new case, please be advised that unless the additional information marked is received within 30 days of the date of this notice this case will be dismissed pursuant to Rule 37.4 for failure to prosecute without prejudice, at the Plaintiff's cost. Collection efforts will be pursued for these costs.

Please refer to the Court's website at www.16thcircuit.org for Court Rules or Forms.

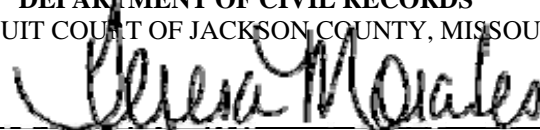
Copies electronic noticed, faxed, emailed and/or mailed JANUARY 24, 2020 to:

COURT ADMINISTRATOR'S OFFICE
DEPARTMENT OF CIVIL RECORDS
CIRCUIT COURT OF JACKSON COUNTY, MISSOURI

JANUARY 24, 2020

Date

By



Deputy Court Administrator

- ☐ 415 East 12th St., Kansas City, Missouri 64106
- ☒ 308 W. Kansas, Independence, Missouri 64050

**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT INDEPENDENCE**

TAMY LORRAINE LUKECART,

PLAINTIFF(S),

VS.

**CASE NO. 2016-CV02502
DIVISION 2**

CITY OF INDEPENDENCE, MISSOURI,

DEFENDANT(S).

**NOTICE OF CASE MANAGEMENT CONFERENCE FOR CIVIL CASE
AND ORDER FOR MEDIATION**

NOTICE IS HEREBY GIVEN that a Case Management Conference will be held with the Honorable **KENNETH R GARRETT III** on **11-MAY-2020** in **DIVISION 2** at **08:30 AM**. All Applications for Continuance of a Case Management Conference should be filed on or before Wednesday of the week prior to the case management setting. Applications for Continuance of a Case Management Conference shall comply with Supreme Court Rule and 16th Cir. R. 34.1. Continuance of a Case Management Conference will only be granted for good cause shown because it is the desire of the Court to meet with counsel and parties in all cases within the first 4 months that a case has been on file. All counsel and parties are directed to check Case.NET on the 16th Judicial Circuit web site at www.16thcircuit.org after filing an application for continuance to determine whether or not it has been granted.

A lead attorney of record must be designated for each party as required by Local Rule 3.5.1. A separate pleading designating the lead attorney of record shall be filed by each party as described in Local Rule 3.5.2. The parties are advised that if they do not file a separate pleading designating lead counsel, even in situations where there is only one attorney representing the party, JIS will not be updated by civil records department, and copies of orders will be sent to the address currently shown in JIS. Civil Records does not update attorney information from answers or other pleadings. The Designation of Lead Attorney pleading shall contain the name of lead counsel, firm name, mailing address, phone number, FAX number and E-mail address of the attorney who is lead counsel.

At the Case Management Conference, counsel should be prepared to address at least the following:

- a. A trial setting;
- b. Expert Witness Disclosure Cutoff Date;
- c. A schedule for the orderly preparation of the case for trial;
- d. Any issues which require input or action by the Court;
- e. The status of settlement negotiations.

MEDIATION

The parties are ordered to participate in mediation pursuant to Supreme Court Rule 17. Mediation shall be completed within 10 months after the date the case is filed for complex cases, and 6 months after the date the case is filed for other circuit cases, unless otherwise ordered by the Court. Each party shall personally appear at the mediation and participate in the process. In the event a party does not have the authority to enter into a settlement, then a representative of the entity that does have actual authority to enter into a settlement on behalf of the party shall also personally attend the mediations with the party.

The parties shall confer and select a mutually agreeable person to act as mediator in this case. If the parties are unable to agree on a mediator the court will appoint a mediator at the Case Management Conference.

Each party shall pay their respective pro-rata cost of the mediation directly to the mediator.

POLICIES/PROCEDURES

Please refer to the Court's web page www.16thcircuit.org for division policies and procedural information listed by each judge.

/S/ KENNETH R GARRETT III

KENNETH R GARRETT III, Circuit Judge

Certificate of Service

This is to certify that a copy of the foregoing was electronic noticed, faxed, emailed and/or mailed or hand delivered to the plaintiff with the delivery of the file-stamped copy of the petition. It is further certified that a copy of the foregoing will be served with the summons on each defendant named in this action.

Attorney for Plaintiff(s):

DAVID TYSON SMITH, 700 CHERRY ST, COLUMBIA, MO 65201

MALIA TAYLOR PARNELL, 700 CHERRY ST, COLUMBIA, MO 65201

Defendant(s):

CITY OF INDEPENDENCE, MISSOURI

CITY OF SUGAR CREEK, MISSOURI

CHRISTOPHER SOULE

BRAD HALSEY

BRENDAN BUCHANAN

VICTOR CONTREAS

DARREN SPADE

Dated: 24-JAN-2020

MARY A. MARQUEZ

Court Administrator

Smith & Parnell LLC

David Tyson Smith
Malia Taylor Parnell
Attorneys at Law

January 28, 2020

Jackson County Circuit Clerk

VIA E-FILE

Re: Tamy Lukecart v. City of Independence Et AL

Case No.: 2016-CV02502

Dear Clerk:

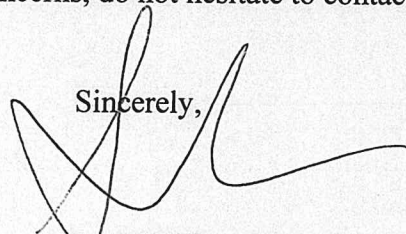
Please prepare summons for all Defendant's in the above matter.

Our office will print and forward the summons to the Jackson County Sheriff's Department for service.

Included is the service fee of \$252.00.

If you have any questions or concerns, do not hesitate to contact our office.

Sincerely,



Sara Williams-Brown

Enclosure




IN THE 16TH JUDICIAL CIRCUIT COURT, JACKSON COUNTY, MISSOURI

Judge or Division: KENNETH R GARRETT III	Case Number: 2016-CV02502
Plaintiff/Petitioner: TAMY LORRAINE LUKECART	Plaintiff's/Petitioner's Attorney/Address MALIA TAYLOR PARNELL 700 CHERRY ST COLUMBIA, MO 65201
Defendant/Respondent: CITY OF INDEPENDENCE, MISSOURI	Court Address: 308 W Kansas INDEPENDENCE, MO 64050
Nature of Suit: CC Wrongful Death	(Date File Stamp)

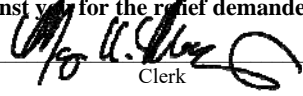
Summons in Civil Case

The State of Missouri to: CITY OF INDEPENDENCE, MISSOURI
Alias:
 C/O REBECCA BEHRENS
 CITY CLERK
 111 EAST MAPLE AVE
 INDEPENDENCE, MO 64050

COURT SEAL OF

JACKSON COUNTY

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

28-JAN-2020
 Date


 Clerk

Further Information:

Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within thirty days after the date of issue.

I certify that I have served the above summons by: (check one)

☐ delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.

☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with _____ a person of the Defendant's/Respondent's family over the age of 15 years who permanently resides with the Defendant/Respondent.

☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to _____ (name) _____ (title).

☐ other _____.

Served at _____ (address)
 in _____ (County/City of St. Louis), MO, on _____ (date) at _____ (time).

 Printed Name of Sheriff or Server

 Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

(Seal) Subscribed and sworn to before me on _____ (date).

My commission expires: _____ Date _____ Notary Public

Sheriff's Fees

Summons	\$ _____
Non Est	\$ _____
Sheriff's Deputy Salary	\$ _____
Supplemental Surcharge	\$ 10.00
Mileage	\$ _____ (_____ miles @ \$ _____ per mile)
Total	\$ _____

A copy of the summons and a copy of the petition must be served on **each** Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

SUMMONS/GARNISHMENT SERVICE PACKETS ATTORNEY INFORMATION

Under the Missouri e-filing system now utilized by the 16th Judicial Circuit Court, once a case has been accepted for filing, a clerk prepares the necessary documents for service. The summons/garnishment is sent to the attorney by an e-mail containing a link so that the filer may print and deliver the summons/garnishment, pleadings and any other necessary documents to the person designated to serve the documents.

Pursuant to State statutes, Supreme Court Rules and Local Court Rules, attorneys are required to print, attach and serve specific documents with certain types of Petitions and other filings.

Please refer to the Court's website for instructions on how to assemble the service packets at:

16thcircuit.org → Electronic Filing Information → Required Documents for Service – eFiled cases → Summons/Garnishment Service Packet Information.

Please review this information periodically, as revisions are frequently made. Thank you.

Circuit Court of Jackson County




IN THE 16TH JUDICIAL CIRCUIT COURT, JACKSON COUNTY, MISSOURI

Judge or Division: KENNETH R GARRETT III	Case Number: 2016-CV02502
Plaintiff/Petitioner: TAMY LORRAINE LUKECART	Plaintiff's/Petitioner's Attorney/Address MALIA TAYLOR PARNELL 700 CHERRY ST COLUMBIA, MO 65201
Defendant/Respondent: CITY OF INDEPENDENCE, MISSOURI	Court Address: 308 W Kansas INDEPENDENCE, MO 64050
Nature of Suit: CC Wrongful Death	(Date File Stamp)

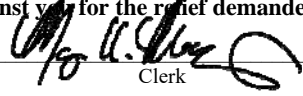
Summons in Civil Case

The State of Missouri to: BRENDAN BUCHANAN
Alias:
 223 N MEMORIAL DRIVE
 INDEPENDENCE, MO 64050

COURT SEAL OF

JACKSON COUNTY

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

28-JAN-2020
 Date


 Clerk

Further Information:

Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within thirty days after the date of issue.

I certify that I have served the above summons by: (check one)

- ☐ delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.
- ☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with _____ a person of the Defendant's/Respondent's family over the age of 15 years who permanently resides with the Defendant/Respondent.
- ☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to _____ (name) _____ (title).
- ☐ other _____.

Served at _____ (address)
 in _____ (County/City of St. Louis), MO, on _____ (date) at _____ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

(Seal)

Subscribed and sworn to before me on _____ (date).

My commission expires: _____ Date _____ Notary Public

Sheriff's Fees

Summons \$ _____
 Non Est \$ _____
 Sheriff's Deputy Salary
 Supplemental Surcharge \$ 10.00
 Mileage \$ _____ (_____ miles @ \$._____ per mile)
Total \$ _____

A copy of the summons and a copy of the petition must be served on **each** Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

SUMMONS/GARNISHMENT SERVICE PACKETS ATTORNEY INFORMATION

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Please review this information periodically, as revisions are frequently made. Thank you.

Circuit Court of Jackson County




IN THE 16TH JUDICIAL CIRCUIT COURT, JACKSON COUNTY, MISSOURI

Judge or Division: KENNETH R GARRETT III	Case Number: 2016-CV02502
Plaintiff/Petitioner: TAMY LORRAINE LUKECART	Plaintiff's/Petitioner's Attorney/Address MALIA TAYLOR PARNELL 700 CHERRY ST COLUMBIA, MO 65201
Defendant/Respondent: CITY OF INDEPENDENCE, MISSOURI	Court Address: 308 W Kansas INDEPENDENCE, MO 64050
Nature of Suit: CC Wrongful Death	

(Date File Stamp)

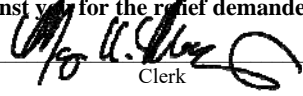
Summons in Civil Case

The State of Missouri to: BRENDAN BUCHANAN
Alias:
 223 N MEMORIAL DRIVE
 INDEPENDENCE, MO 64050

COURT SEAL OF

JACKSON COUNTY

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

28-JAN-2020
 Date


 Clerk

Further Information:

Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within thirty days after the date of issue.

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- ☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to _____ (name) _____ (title).
- ☐ other _____.

Served at _____ (address)
 in _____ (County/City of St. Louis), MO, on _____ (date) at _____ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

(Seal)

Subscribed and sworn to before me on _____ (date).

My commission expires: _____ Date _____ Notary Public

Sheriff's Fees

Summons \$ _____
 Non Est \$ _____
 Sheriff's Deputy Salary
 Supplemental Surcharge \$ 10.00
 Mileage \$ _____ (_____ miles @ \$._____ per mile)
Total \$ _____

A copy of the summons and a copy of the petition must be served on **each** Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

SUMMONS/GARNISHMENT SERVICE PACKETS ATTORNEY INFORMATION

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Please review this information periodically, as revisions are frequently made. Thank you.

Circuit Court of Jackson County




IN THE 16TH JUDICIAL CIRCUIT COURT, JACKSON COUNTY, MISSOURI

Judge or Division: KENNETH R GARRETT III	Case Number: 2016-CV02502
Plaintiff/Petitioner: TAMY LORRAINE LUKECART	Plaintiff's/Petitioner's Attorney/Address MALIA TAYLOR PARNELL 700 CHERRY ST COLUMBIA, MO 65201
Defendant/Respondent: CITY OF INDEPENDENCE, MISSOURI	Court Address: 308 W Kansas INDEPENDENCE, MO 64050
Nature of Suit: CC Wrongful Death	

(Date File Stamp)

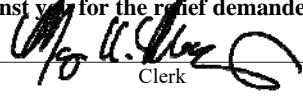
Summons in Civil Case

The State of Missouri to: BRAD HALSEY
Alias:
223 N MEMORIAL DRIVE
INDEPENDENCE, MO 64050

COURT SEAL OF

JACKSON COUNTY

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

28-JAN-2020
Date


Clerk

Further Information:

Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within thirty days after the date of issue.

I certify that I have served the above summons by: (check one)

☐ delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.

☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with _____ a person of the Defendant's/Respondent's family over the age of 15 years who permanently resides with the Defendant/Respondent.

☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to _____ (name) _____ (title).

☐ other _____.

Served at _____ (address)
in _____ (County/City of St. Louis), MO, on _____ (date) at _____ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

(Seal) Subscribed and sworn to before me on _____ (date).

My commission expires: _____ Date _____ Notary Public

Sheriff's Fees

Summons \$ _____

Non Est \$ _____

Sheriff's Deputy Salary \$ 10.00

Supplemental Surcharge \$ _____

Mileage \$ _____ (_____ miles @ \$. _____ per mile)

Total \$ _____

A copy of the summons and a copy of the petition must be served on **each** Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

SUMMONS/GARNISHMENT SERVICE PACKETS ATTORNEY INFORMATION

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Circuit Court of Jackson County




IN THE 16TH JUDICIAL CIRCUIT COURT, JACKSON COUNTY, MISSOURI

Judge or Division: KENNETH R GARRETT III	Case Number: 2016-CV02502
Plaintiff/Petitioner: TAMY LORRAINE LUKECART	Plaintiff's/Petitioner's Attorney/Address MALIA TAYLOR PARNELL 700 CHERRY ST COLUMBIA, MO 65201
Defendant/Respondent: CITY OF INDEPENDENCE, MISSOURI	Court Address: 308 W Kansas INDEPENDENCE, MO 64050
Nature of Suit: CC Wrongful Death	(Date File Stamp)

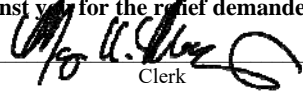
Summons in Civil Case

The State of Missouri to: DARREN SPADE
Alias:
223 N MEMORIAL DRIVE
INDEPENDENCE, MO 64050

COURT SEAL OF

JACKSON COUNTY

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

28-JAN-2020
Date


Clerk

Further Information:

Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within thirty days after the date of issue.

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☐ leaving a copy of the summons and a copy of the petition at the dwelling place or usual abode of the Defendant/Respondent with _____ a person of the Defendant's/Respondent's family over the age of 15 years who permanently resides with the Defendant/Respondent.

☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to _____ (name) _____ (title).

☐ other _____.

Served at _____ (address)
in _____ (County/City of St. Louis), MO, on _____ (date) at _____ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

(Seal) Subscribed and sworn to before me on _____ (date).

My commission expires: _____ Date _____ Notary Public

Sheriff's Fees

Summons \$ _____

Non Est \$ _____

Sheriff's Deputy Salary \$ 10.00

Supplemental Surcharge \$ _____

Mileage \$ _____ (_____ miles @ \$. _____ per mile)

Total \$ _____

A copy of the summons and a copy of the petition must be served on **each** Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.

SUMMONS/GARNISHMENT SERVICE PACKETS ATTORNEY INFORMATION

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Circuit Court of Jackson County




IN THE 16TH JUDICIAL CIRCUIT COURT, JACKSON COUNTY, MISSOURI

Judge or Division: KENNETH R GARRETT III	Case Number: 2016-CV02502
Plaintiff/Petitioner: TAMY LORRAINE LUKECART	Plaintiff's/Petitioner's Attorney/Address MALIA TAYLOR PARNELL 700 CHERRY ST COLUMBIA, MO 65201
Defendant/Respondent: CITY OF INDEPENDENCE, MISSOURI	Court Address: 308 W Kansas INDEPENDENCE, MO 64050
Nature of Suit: CC Wrongful Death	(Date File Stamp)

Summons in Civil Case

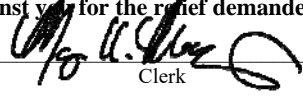
The State of Missouri to: CITY OF SUGAR CREEK, MISSOURI
Alias:

JANA OLIVAREZ
CITY CLERK
1001 HEROES WAY
SUGAR CREEK, MO 64054

COURT SEAL OF

JACKSON COUNTY

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

28-JAN-2020
Date


Clerk

Further Information:

Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within thirty days after the date of issue.

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- ☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to _____ (name) _____ (title).
- ☐ other _____.

Served at _____ (address)
in _____ (County/City of St. Louis), MO, on _____ (date) at _____ (time).

Printed Name of Sheriff or Server

Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

(Seal)

Subscribed and sworn to before me on _____ (date).

My commission expires: _____ Date _____ Notary Public

Sheriff's Fees

Summons \$ _____
Non Est \$ _____
Sheriff's Deputy Salary \$ _____
Supplemental Surcharge \$ 10.00
Mileage \$ _____ (_____ miles @ \$._____ per mile)
Total \$ _____

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Circuit Court of Jackson County




IN THE 16TH JUDICIAL CIRCUIT COURT, JACKSON COUNTY, MISSOURI

Judge or Division: KENNETH R GARRETT III	Case Number: 2016-CV02502
Plaintiff/Petitioner: TAMY LORRAINE LUKECART	Plaintiff's/Petitioner's Attorney/Address MALIA TAYLOR PARNELL 700 CHERRY ST COLUMBIA, MO 65201
Defendant/Respondent: CITY OF INDEPENDENCE, MISSOURI	Court Address: 308 W Kansas INDEPENDENCE, MO 64050
Nature of Suit: CC Wrongful Death	

(Date File Stamp)

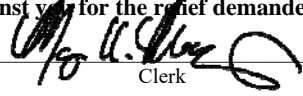
Summons in Civil Case

The State of Missouri to: VICTOR CONTREAS
Alias:
 1001 HEROES WAY
 SUGAR CREEK, MO 64054

COURT SEAL OF

JACKSON COUNTY

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28-JAN-2020
 Date


 Clerk

Further Information:

Sheriff's or Server's Return

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☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to _____ (name) _____ (title).

☐ other _____.

Served at _____ (address)
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 Printed Name of Sheriff or Server

 Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

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My commission expires: _____ Date _____ Notary Public

Sheriff's Fees

Summons \$ _____

Non Est \$ _____

Sheriff's Deputy Salary \$ 10.00

Supplemental Surcharge \$ _____

Mileage \$ _____ (_____ miles @ \$._____ per mile)

Total \$ _____

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Circuit Court of Jackson County




IN THE 16TH JUDICIAL CIRCUIT COURT, JACKSON COUNTY, MISSOURI

Judge or Division: KENNETH R GARRETT III	Case Number: 2016-CV02502
Plaintiff/Petitioner: TAMY LORRAINE LUKECART	Plaintiff's/Petitioner's Attorney/Address MALIA TAYLOR PARNELL 700 CHERRY ST COLUMBIA, MO 65201
Defendant/Respondent: CITY OF INDEPENDENCE, MISSOURI	Court Address: 308 W Kansas INDEPENDENCE, MO 64050
Nature of Suit: CC Wrongful Death	

(Date File Stamp)

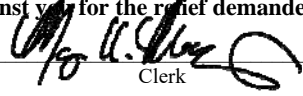
Summons in Civil Case

The State of Missouri to: CHRISTOPHER SOULE
Alias:
 1001 HEROES WAY
 SUGAR CREEK, MO 64054

COURT SEAL OF

JACKSON COUNTY

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

28-JAN-2020
 Date


 Clerk

Further Information:

Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within thirty days after the date of issue.

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☐ (for service on a corporation) delivering a copy of the summons and a copy of the petition to _____ (name) _____ (title).

☐ other _____.

Served at _____ (address)
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 Printed Name of Sheriff or Server

 Signature of Sheriff or Server

Must be sworn before a notary public if not served by an authorized officer:

(Seal) Subscribed and sworn to before me on _____ (date).

My commission expires: _____ Date _____ Notary Public

Sheriff's Fees

Summons \$ _____

Non Est \$ _____

Sheriff's Deputy Salary \$ 10.00

Supplemental Surcharge \$ _____

Mileage \$ _____ (_____ miles @ \$._____ per mile)

Total \$ _____

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SUMMONS/GARNISHMENT SERVICE PACKETS ATTORNEY INFORMATION

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Circuit Court of Jackson County




IN THE 16TH JUDICIAL CIRCUIT COURT, JACKSON COUNTY, MISSOURI

Judge or Division: KENNETH R GARRETT III	Case Number: 2016-CV02502
Plaintiff/Petitioner: TAMY LORRAINE LUKECART	Plaintiff's/Petitioner's Attorney/Address MALIA TAYLOR PARNELL 700 CHERRY ST COLUMBIA, MO 65201
Defendant/Respondent: CITY OF INDEPENDENCE, MISSOURI	Court Address: 308 W Kansas INDEPENDENCE, MO 64050
Nature of Suit: CC Wrongful Death	

(Date File Stamp)

Summons in Civil Case

The State of Missouri to: BRENDAN BUCHANAN Alias: 223 N MEMORIAL DRIVE INDEPENDENCE, MO 64050 <i>Sal</i>	
 CIRCUIT COURT OF MISSOURI JACKSON COUNTY	<p>You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.</p> <p><u>28-JAN-2020</u> Date</p> <p><i>[Signature]</i> Clerk</p>
Further Information:	
Sheriff's or Server's Return Note to serving officer: Summons should be returned to the court within thirty days after the date of issue. I certify that I have served the above summons by: (check one) <input type="checkbox"/> delivering a copy to the defendant/respondent	

RETURN

I hereby certify that I have delivered copies of the within summons and petition in Jackson County, Missouri to BRENDAN BUCHANAN & ALLEN as requested by the attorney for the plaintiff.
HIEBERT - ALLEN

Place of Delivery: 223 N. Memorial Dr. Indep. Mo.
 Date of Delivery: 2-6-20
 Time of Delivery: 1:40 PM

DEPARTMENT OF CIVIL PROCESS
 COURT ADMINISTRATOR'S OFFICE
 CIRCUIT COURT OF JACKSON COUNTY, MISSOURI

By: *[Signature]*

Deputy

CIRCT 3000 - 05/18

A copy of the summons and a copy of the petition must be served on each Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.



IN THE 16TH JUDICIAL CIRCUIT COURT, JACKSON COUNTY, MISSOURI


Judge or Division: KENNETH R GARRETT III	Case Number: 2016-CV02502
Plaintiff/Petitioner: TAMY LORRAINE LUKECART	Plaintiff's/Petitioner's Attorney/Address MALIA TAYLOR PARNELL 700 CHERRY ST COLUMBIA, MO 65201
Defendant/Respondent: CITY OF INDEPENDENCE, MISSOURI	Court Address: 308 W Kansas INDEPENDENCE, MO 64050
Nature of Suit: CC Wrongful Death	

(Date File Stamp)

Summons in Civil Case

The State of Missouri to: CITY OF INDEPENDENCE, MISSOURI
Alias:

C/O REBECCA BEHRENS
CITY CLERK
111 EAST MAPLE AVE
INDEPENDENCE, MO 64050

COURT SEAL OF

JACKSON COUNTY

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28-JAN-2020
Date

Further Information:

Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within thirty days after the date of issue.

I certify that I have served the above summons by: (check one)

☐ delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.

PUBLIC OR QUASI-PUBLIC CORPORATION OR BODY

I certify that I have served the within summons in Jackson County, Missouri, upon the within named public or quasi-public corporation or body, defendant CITY OF INDEPENDENCE MO. by leaving a copy of the summons and a copy of the petition with:

- ☐ COUNTY: _____
- ☐ CLERK OF THE JACKSON COUNTY LEGISLATURE
- ☒ CITY: REBECCA BEHRENS
- ☐ MAYOR ☒ CITY CLERK ☐ CITY ATTORNEY
- ☐ OTHER: _____ ☐ CHIEF EXECUTIVE OFFICER
- ☐ STATED HE WAS LAWFULLY DESIGNATED TO RECEIVE SERVICE

Place of Service 111 E Maple Indep Mo.

Date of Service 2-6-20

Time of Service 1:30 PM

DEPARTMENT OF CIVIL PROCESS
COURT ADMINISTRATOR'S OFFICE
CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
BY [Signature] **DEPUTY**

CIRCT 3055- 12/13

A copy of the summons and a copy of the petition must be served on each Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.



IN THE 16TH JUDICIAL CIRCUIT COURT, JACKSON COUNTY, MISSOURI

2
27

Judge or Division: KENNETH R GARRETT III	Case Number: 2016-CV02502
Plaintiff/Petitioner: TAMY LORRAINE LUKECART	Plaintiff's/Petitioner's Attorney/Address MALIA TAYLOR PARNELL 700 CHERRY ST COLUMBIA, MO 65201
Defendant/Respondent: CITY OF INDEPENDENCE, MISSOURI	Court Address: 308 W Kansas INDEPENDENCE, MO 64050
Nature of Suit: CC Wrongful Death	


RECEIVED CIVIL PROCESS
JAN 20 2020
(Date File Stamp)

Summons in Civil Case

The State of Missouri to: CITY OF SUGAR CREEK, MISSOURI
Alias:

JANA OLIVAREZ
CITY CLERK
1001 HEROES WAY
SUGAR CREEK, MO 64054

Sug

COURT SEAL OF

JACKSON COUNTY

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

28-JAN-2020
Date

[Signature]
Clerk

Further Information:

Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within thirty days after the date of issue.

I certify that I have served the above summons by: (check one)

PUBLIC OR QUASI-PUBLIC CORPORATION OR BODY

I certify that I have served the within summons in Jackson County, Missouri, upon the within named public or quasi-public corporation or body, defendant CITY OF SUGAR CREEK MO. by leaving a copy of the summons and a copy of the petition with:

- ☐ COUNTY: _____
CLERK OF THE JACKSON COUNTY LEGISLATURE
- ☐ CITY: _____
☐ MAYOR ☐ CITY CLERK ☐ CITY ATTORNEY
- ☒ OTHER: SHARLI DUTY - COMMUNICATIONS OFFICER ☐ CHIEF EXECUTIVE OFFICER
- ☒ STATED HE WAS LAWFULLY DESIGNATED TO RECEIVE SERVICE

Place of Service 1001 HEROES WAY SUGAR CREEK MO.

Date of Service 2-6-20

Time of Service 12:18 PM

DEPARTMENT OF CIVIL PROCESS
COURT ADMINISTRATOR'S OFFICE
CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
BY *[Signature]*
DEPUTY

CIRCT 3055-12/13

Total

\$

A copy of the summons and a copy of the petition must be served on each Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.




IN THE 16TH JUDICIAL CIRCUIT COURT, JACKSON COUNTY, MISSOURI

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27

Judge or Division: KENNETH R GARRETT III	Case Number: 2016-CV02502
Plaintiff/Petitioner: TAMY LORRAINE LUKECART	Plaintiff's/Petitioner's Attorney/Address MALIA TAYLOR PARNELL 700 CHERRY ST COLUMBIA, MO 65201
Defendant/Respondent: CITY OF INDEPENDENCE, MISSOURI	Court Address: 308 W Kansas INDEPENDENCE, MO 64050
Nature of Suit: CC Wrongful Death	

(Date File Stamp)

Summons in Civil Case

The State of Missouri to: VICTOR CONTREAS Alias: 1001 HEROES WAY SUGAR CREEK, MO 64054	
 COURT SEAL OF JACKSON COUNTY	You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition. 28-JAN-2020 Date Further Information:
Sheriff's or Server's Return Note to serving officer: Summons should be returned to the court within thirty days after the date of issue. I certify that I have served the above summons by: (check one)	

RETURN

I hereby certify that I have delivered copies of the within summons and petition in Jackson County, Missouri to VICTOR CONTREAS 410 Shari Duty as requested by the attorney for the plaintiff.
communications officer

Place of Delivery: 1001 Heroes Way Sugar Creek MO
 Date of Delivery: 2-6-20
 Time of Delivery: 12:18 PM

DEPARTMENT OF CIVIL PROCESS
 COURT ADMINISTRATOR'S OFFICE
 CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
 By: [Signature]
 Deputy

CIRCT 3000 - 05/18

Total \$ _____
 A copy of the summons and a copy of the petition must be served on each Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.




IN THE 16TH JUDICIAL CIRCUIT COURT, JACKSON COUNTY, MISSOURI

2
27

Judge or Division: KENNETH R GARRETT III	Case Number: 2016-CV02502
Plaintiff/Petitioner: TAMY LORRAINE LUKECART	Plaintiff's/Petitioner's Attorney/Address MALIA TAYLOR PARNELL 700 CHERRY ST COLUMBIA, MO 65201
Defendant/Respondent: CITY OF INDEPENDENCE, MISSOURI	Court Address: 308 W Kansas INDEPENDENCE, MO 64050
Nature of Suit: CC Wrongful Death	

RECEIVED CIVIL PROCESS
JAN 23 2 01 PM '20
(Date File Stamp)

Summons in Civil Case

The State of Missouri to: BRAD HALSEY Alias: 223 N MEMORIAL DRIVE INDEPENDENCE, MO 64050	
 COURT SEAL OF JACKSON COUNTY	You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition. 28-JAN-2020 Date Further Information:
Sheriff's or Server's Return Note to serving officer: Summons should be returned to the court within thirty days after the date of issue. I certify that I have served the above summons by: (check one) <input type="checkbox"/> delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.	

RETURN

I hereby certify that I have delivered copies of the within summons and petition in Jackson County, Missouri to Brad Halsey 90 Allen Hiebert as requested by the attorney for the plaintiff.
OFFICER

Place of Delivery: 223 N. Memorial Dr. Indep Mo.
 Date of Delivery: 2-6-20
 Time of Delivery: 1:40 PM

DEPARTMENT OF CIVIL PROCESS
 COURT ADMINISTRATOR'S OFFICE
 CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
 By: [Signature]
 Deputy

CIRCT 3000 - 05/18

A copy of the summons and a copy of the petition must be served on each Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.



IN THE 16TH JUDICIAL CIRCUIT COURT, JACKSON COUNTY, MISSOURI


2
27

RECEIVED CIVIL PROCESS

Judge or Division: KENNETH R GARRETT III	Case Number: 2016-CV02502
Plaintiff/Petitioner: TAMY LORRAINE LUKECART	Plaintiff's/Petitioner's Attorney/Address MALIA TAYLOR PARNELL 700 CHERRY ST COLUMBIA, MO 65201
Defendant/Respondent: CITY OF INDEPENDENCE, MISSOURI	Court Address: 308 W Kansas INDEPENDENCE, MO 64050
Nature of Suit: CC Wrongful Death	

(Date File Stamp)

Summons in Civil Case

The State of Missouri to: CHRISTOPHER SOULE Alias: <i>Sal</i> 1001 HEROES WAY SUGAR CREEK, MO 64054	
 COURT SEAL OF JACKSON COUNTY	<p>You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.</p> <p><u>28-JAN-2020</u> Date</p> <p><i>[Signature]</i> Clerk</p>
Sheriff's or Server's Return Note to serving officer: Summons should be returned to the court within thirty days after the date of issue. I certify that I have served the above summons by: (check one)	

RETURN

I hereby certify that I have delivered copies of the within summons and petition in Jackson County, Missouri to Christopher Soule 410 Sharni Dr as requested by the attorney for the plaintiff.
Communication Officer

Place of Delivery: 1001 Heroes Way Sugar Creek MO
 Date of Delivery: 2-6-20
 Time of Delivery: 12:18 PM

DEPARTMENT OF CIVIL PROCESS
 COURT ADMINISTRATOR'S OFFICE
 CIRCUIT COURT OF JACKSON COUNTY, MISSOURI

By: *[Signature]*
 Deputy

CIRCT 3000 - 05/18

Total \$	
A copy of the summons and a copy of the petition must be served on each Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.	



IN THE 16TH JUDICIAL CIRCUIT COURT, JACKSON COUNTY, MISSOURI

RECEIVED CIVIL PROCESS

2/27

Judge or Division: KENNETH R GARRETT III	Case Number: 2016-CV02502
Plaintiff/Petitioner: TAMY LORRAINE LUKECART	Plaintiff's/Petitioner's Attorney/Address MALIA TAYLOR PARNELL 700 CHERRY ST COLUMBIA, MO 65201
vs.	
Defendant/Respondent: CITY OF INDEPENDENCE, MISSOURI	Court Address: 308 W Kansas INDEPENDENCE, MO 64050
Nature of Suit: CC Wrongful Death	

(Date File Stamp)

Summons in Civil Case

The State of Missouri to: DARREN SPADE
Alias:
223 N MEMORIAL DRIVE
INDEPENDENCE, MO 64050

COURT SEAL OF

JACKSON COUNTY

You are summoned to appear before this court and to file your pleading to the petition, a copy of which is attached, and to serve a copy of your pleading upon the attorney for Plaintiff/Petitioner at the above address all within 30 days after receiving this summons, exclusive of the day of service. If you fail to file your pleading, judgment by default may be taken against you for the relief demanded in the petition.

28-JAN-2020
Date

Further Information:

Sheriff's or Server's Return

Note to serving officer: Summons should be returned to the court within thirty days after the date of issue.

I certify that I have served the above summons by: (check one)

☐ delivering a copy of the summons and a copy of the petition to the Defendant/Respondent.

RETURN

I hereby certify that I have delivered copies of the within summons and petition in Jackson County, Missouri to DARREN SPADE 90 ALLEN HIEGED - as requested by the attorney for the plaintiff.
DEKLEN

Place of Delivery: 223 N. Memorial Dr. Indep Mo.
Date of Delivery: 2-6-20
Time of Delivery: 1:40 PM

DEPARTMENT OF CIVIL PROCESS
COURT ADMINISTRATOR'S OFFICE
CIRCUIT COURT OF JACKSON COUNTY, MISSOURI

By: [Signature]
Deputy

CIRCT 3000 - 05/18

A copy of the summons and a copy of the petition must be served on each Defendant/Respondent. For methods of service on all classes of suits, see Supreme Court Rule 54.